

1 10. Work collaboratively with team members.

2 11. Be sensitive to Donor's needs and pray with them when appropriate.

3 12. Perform other duties as assigned.

4 13. Keep informed of organizational announcements, activities and changes via
5 regular reading of the WVUS Intranet and other corporate communication
6 tools.

7 Exh. 1.

8 A holistic consideration of this job description demonstrates that Plaintiff would not have
9 performed "vital religious duties." The job description is not for a role that is important "in the life
10 of the religion." *Cf. Our Lady of Guadalupe*, 140 S. Ct. at 2066. As the job description makes clear,
11 the main duties of the customer service representative position related to furthering Defendant's
12 charitable activities. The essential function of the customer service representative position was to
13 "learn, understand and develop the skills necessary to acquire and maintain donor relationships
14 through basic inbound and outbound calls. ... [s]erve as a liaison between donors and the general
15 public as well as provide basic levels of customer service for all special programs." Exh. 1.

16 Customer service representatives receive inbound calls from individuals who are
17 "potentially existing donors or may be looking to donate" or customer service representatives will
18 "make outbound calls to existing donors." Exh. 10, at 22:10-18. Customer service representatives
19 learn of existing donors' identities through access to a database maintained by Defendant. Exh. 10,
20 at 22:19-23. Donors are predominantly Christian, but not exclusively. Exh. 10, at 22:24-23:4. Donors
21 are not members of World Vision. *Id.* Melanie Freiberg ("Freiberg"), who held the position of "HR
22 Director talent management," Exh. 13, at 11:14-16, was Defendant's 30(b)(6) designee. She agreed
23 that the "tasks" of a customer service representative are to "acquire and maintain donor relationships
24 through the basic inbound and outbound calls." Exh. 10, at 20:20-24.

25 In its original motion for summary judgment, Defendant claimed the customer service
26 representative job description showed that Plaintiff "would be a 'crucial member' of [donor customer
services] and a 'key liaison' and 'voice of World Vision' to [their] donors and the general public.'"